

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:	)	20-cv-06523 (LAK)
TRANSCARE CORPORATION, et al.,	)	16-bk-10407 (DSJ)
	)	
Debtors.	)	18-ap-01021 (DSJ)
	)	
SALVATORE LAMONICA, as Chapter 7	)	
Trustee of the Jointly-Administered Estates of	)	
TransCare Corporation, et al,	)	
	)	
Plaintiff,	)	
v.	)	
LYNN TILTON, et al.	)	
Defendants.	)	
	)	

**RESPONSE OF LYNN TILTON TO TRUSTEE'S  
MOTION TO ENFORCE SURETY BOND**

The Trustee has asked this Court to issue an order requiring Argo Surety to pay the judgment against Ms. Tilton pursuant to the terms of a bond that secured the judgment pending appeal. The Trustee never demanded that Ms. Tilton satisfy the judgment, and Ms. Tilton never refused to do so. Accordingly, while Ms. Tilton has no objection to entry of the order requested by the Trustee, the Trustee's election to proceed against the bond is not based on any action or inaction of Ms. Tilton.

Dated: November 15, 2023

Respectfully submitted,

/s/ Michael T. Mervis

Michael T. Mervis  
PROSKAUER ROSE LLP  
11 Times Square  
New York, N.Y. 10036  
(212) 969-3000

*Counsel for Lynn Tilton*